

BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

ORIGINAL  
FILE

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DEC 15 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Assignments )  
FM Broadcast Stations )  
(Oakhurst, California) )

RM-  
MM Docket

To: Chief, Mass Media Bureau

PETITION FOR RULEMAKING

California Sierra Corporation, licensee of KAAT(FM), Channel 296A in Oakhurst, California (KAAT), pursuant to Section 1.401 and 1.420(g) of the Commission's rules, requests that Channel 276A be substituted for Channel 296A in Oakhurst, California. In order to accommodate the substitution, KAAT also requests that Channel 234A be substituted for Channel 276A in Firebaugh, California.

The public interest supports grant of this rulemaking request. The proposed substitutions will allow KAAT to achieve equivalent 6 kw operation from its existing licensed site. KAAT is presently short spaced to KMMM, licensed to Madera, California and, absent a mutual agreement with KMMM, is unable to increase power.

Channel 234A must be substituted for Channel 276A in Firebaugh, California in order to accommodate the requested channel substitution. Channel 276A at Firebaugh is a vacant allotment although there is currently pending a petition for reconsideration filed by Central Valley Educational Services,

Enc'd 4  
ENCLOSURE

Inc. seeking reinstatement of its application for Channel 276A. Channel 234A is available for allotment at Firebaugh at both the FCC reference point and at the site proposed in the Central Valley Educational Services, Inc. application.

KAAT will promptly file an application for authorization to operate on Channel 276A and will construct the facility if this Petition is granted.

WHEREFORE, KAAT requests that the Table of Allotments be amended as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Oakhurst, California	296A	276A <sup>1</sup>
Firebaugh, California	276A	234A

Respectfully submitted,

CALIFORNIA SIERRA CORPORATION

By A. Wray Fitch III  
A. Wray Fitch III  
Its Counsel

GAMMON & GRANGE, P.C.  
8280 Greensboro Drive  
Seventh Floor  
McLean, VA 22102  
(703) 761-5000

December 15, 1992

[98.rulemaking]

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<sup>1</sup> KAAT proposes to remain at its existing site at latitude 37-25-08, longitude 119-44-04.

December 10, 1992

Donna R. Searcy  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

**RE: Amendment of FM Table of Allotments  
Substitution of  
276A for 296A - Oakhurst, CA  
234A for 276A - Firebaugh, CA**

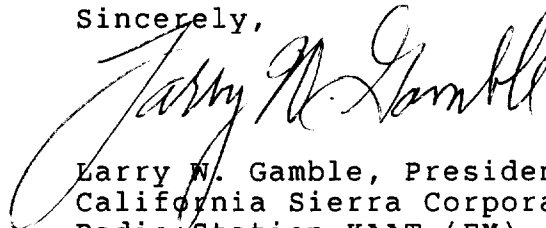
Dear Ms. Searcy:

Please let this letter (original & four copies) serve as a request to amend the FM Table of Allotments, Section 73.202, to substitute FM Channel 276A for 296A at Oakhurst, CA, and Channel 234A for 276A at Firebaugh, CA.

The requested substitutions will permit Radio Station KAAT at Oakhurst to achieve equivalent 6 KW operation from its existing licensed site. The attached exhibit by Mullaney Engineering establishes that the proposed substitutions are in compliance with the FCC's rules.

The address stated below is current and should the channel substitution be granted, KAAT will promptly file an application for modification of facilities.

Sincerely,



Larry W. Gamble, President  
California Sierra Corporation  
Radio Station KAAT (FM)  
40356 Oak Park Way  
Oakhurst, CA 93644  
209-683-5107

encl - Exhibit RM

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

301 921-0115

**ENGINEERING EXHIBIT RM:**

**CALIFORNIA SIERRA CORPORATION  
RADIO STATION KAAT  
OAKHURST, CALIFORNIA  
SUBSTITUTION OF FM CHANNEL 276A FOR 296A  
FIREBAUGH, CALIFORNIA  
SUBSTITUTION OF FM CHANNEL 234A FOR 276A**

**DECEMBER 9, 1992**

**ENGINEERING STATEMENT IN SUPPORT OF A  
PETITION FOR RULE MAKING  
TO AMEND  
THE FM TABLE OF ASSIGNMENTS**

**ORIGINAL  
SIGNATURE**

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT RM:**

**CALIFORNIA SIERRA CORPORATION  
RADIO STATION KAAT  
OAKHURST, CALIFORNIA  
SUBSTITUTION OF FM CHANNEL 276A FOR 296A  
FIREBAUGH, CALIFORNIA  
SUBSTITUTION OF FM CHANNEL 234A FOR 276A**

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6. Figure 4, Firebaugh - Pending Site Channel 234A Study.

**MULLANEY ENGINEERING, INC.**

**DECLARATION**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by California Sierra Corporation, licensee of Radio Station KAAT at Oakhurst, California, to prepare an engineering statement in support of a Petition to Amend the FM Table of Assignments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

  
John J. Mullaney

Executed on the 9th day of December 1992.

ENGINEERING EXHIBIT RM:

CALIFORNIA SIERRA CORPORATION  
RADIO STATION KAAT  
OAKHURST, CALIFORNIA  
SUBSTITUTION OF FM CHANNEL 276A FOR 296A  
FIREBAUGH, CALIFORNIA  
SUBSTITUTION OF FM CHANNEL 234A FOR 276A

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement has been prepared on behalf of California Sierra Corporation, licensee of Radio Station KAAT at Oakhurst, California. The purpose of this statement is to support a request that the FM Table of Assignments be amended to substitute Ch. 276A for 296A at Oakhurst, California. The substitution requested by KAAT will also require the substitution of Ch. 234A for 276A at Firebaugh, California.

KAAT wishes to point out that it is requesting substitution of a 6 KW Class A channel for its existing 3 KW Class A channel and, therefore, it is not necessary to demonstrate the availability of an additional equivalent channel in this type of proceeding.

It should be noted that the area in question is not within 320 kilometers (200 miles) of a U.S. Border and, therefore, foreign concurrence is required.

II. ENGINEERING DISCUSSION:

A. Proposed Site:

KAAT proposes to remain at its existing site located at the following coordinates:

Latitude: 37° 25' 08"  
Longitude: 119° 44' 04"

Since this is KAAT's existing licensed site there is no doubt concerning city grade service.

B. Channel Allocation Study:

Figure 1 is a Channel Allocation Study from KAAT's existing site on their existing channel 296A. The study indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings. From this study it can be determined that KAAT is present short spaced to KMMM and, therefore, prevented from 6 KW operation absent a mutual agreement. There is no immediate substitution available for KMMM at their authorized site.

Figure 2 is a Channel Allocation Study from KAAT's existing site on the proposed channel 276A. From this study it can be determined that with the single exception of a short spacing to the vacant allotment on channel 276A at Firebaugh, CA, 6 KW operation by KAAT is possible. Central Valley Educational Services, Inc., has a petition for reconsideration pending regarding the return of their application at Firebaugh (BPED881017MD).

It should be noted that channel 234A is available for allotment at Firebaugh at both the FCC reference



**Radio Station KAAAT  
Substitution of Ch. 276A for 296A**

**MULLANEY ENGINEERING, INC.**

point (Figure 3) and at the site proposed in the pending application (Figure 4). Consequently, the proposed substitution will have no impact on the outcome of the petition.

**C. Public Interest Showing:**

KAAAT currently operates with 0.28 KW at 326 meters. The proposed substitution of Ch. 276A will permit KAAAT to operate with 0.55 KW or maximum Class A facilities. The substitution at Firebaugh is a no impact change since both the existing & proposed channels qualify for 6 KW.

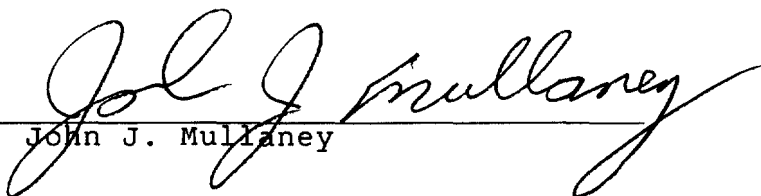
Based upon the above reasons KAAAT believes that the requested channel substitution is in the Public Interest and therefore, should be granted by the Commission.

**III. SUMMARY:**

California Sierra Corporation, licensee of Radio Station KAAAT requests that the FM Table of Assignments be amended to substitute the following channels:

<b>City</b>	<b>Present</b>	<b>Proposed</b>
Oakhurst, California	296A	276A
Firebaugh, California	276A	234A

December 9, 1992.

  
John J. Mullaney

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-DEC-92 15:12:34 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 921207 \*\*\*\*\*

KAAT	BLH841123LW	296 A	FM	POLARIZATION	ERP (KW)	HAAT	RCMSL
Oakhurst CA	US		LIC		HOR PLN BM TILT	(METER)	(METER)
37.2508	119.4404 (D,MHSS)			HORIZONTAL	0.280 0.000	326.0	1322
California Sierra Corporation				VERTICAL	0.280 0.000	326.0	1322

EXISTING CHANNEL - OAKHURST, CA.

\*\*\*\*\*

AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D,MHSS)	LONG	REL CHN	ERP (KW)		HAAT (M)	I-CON P-CON		IR		IC	REZLT
FROM	TO									HORZ	VERT		A	F5010	F5050	DIST		
296.5	116.3	KUBB	LIC	BLH870202KH	Mariposa	CA A	37.3200	120.0129	IF 242B	1.90H	1.90V	644			28.6	15.		
69.2	249.7	KHMT	ADD	RM8019	Mammoth L	CA A	37.3740	119.0156	3RD 293B1	H	V				66.3	48.		
**COMMENT**Pm													**DOCKET**92-146 **					
241.2	60.6	KQLB	CP	BMPH910913IB	Los Banos	CA A	36.5535	120.5042	1ST 295A	6.0H	6.0V	100			112.8	72.		
356.5	176.4	KRNOFM	LIC	BLH870805KC	Reno	NV A	39.1838	119.5301	1ST 295C	37.H	37.V	911			210.4	165.		
0.0	0.0	KAAT	LIC	BLH841123LW	Oakhurst	CA A	37.2508	119.4404	CD 296A	.280H	.280V	326			0.0	115.	-	
211.6	31.3	KMMM	CP	BPH870827NM	Madera	CA A	36.5511	120.0703	1ST 297A	3.00H	3.00V	100			65.0	72.	S	

\*\*\*\*\*

NOTE: EXISTING SHORT SPACING WITH KMMM PREVENTS 6 KW OPERATION

**MULLANEY ENGINEERING, INC.**  
**GAITHERSBURG, MARYLAND**

**FIGURE 1**  
**EXISTING CHANNEL STUDY - 296A**

CALIFORNIA SIERRA CORPORATION  
 SUBSTITUTION OF  
 276A FOR 296A - OAKHURST, CA  
 234A FOR 276A - FIREBAUGH, CA

\*\*\*\*\* FM CHANNEL STUDY NO. 2 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-DEC-92 15:13:17 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 921207 \*\*\*\*\*

KAAT	276 A	POLARIZATION	ERP (KW)	HAAT	RCMSL
Oakhurst CA US			HOR PLN BM TILT	(METER)	(METER)
37,2508 119.4404 (D.MSS)		HORIZONTAL	0.550 0.000	326.0	1322
		VERTICAL	0.550 0.000	326.0	1322

EXISTING SITE - SUGGESTED CHANNEL SUBSTITUTION 276A FOR 296A

AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MSS)	LONG	REL CHN	ERP (KW)		HAAT D (M)	I-CON F5010 (KM)	P-CON F5050 (KM)	DIST (KM)	RSEP (KM)	IR (KM)	IC (KM)	REZLT
FROM	TO									HORZ	VERT								
163.3	343.4	KTHT	LIC	BLH6507	Fresno	CA A	36.4907	119.3033	2ND 274B	50.H	50.V	152				69.6	69.		C
356.2	176.1		VAC		South Lak	CA A	39.0915	119.5255	1ST 275C	H	V					193.0	165.		
**COMMENT**Site Restricted-Effective 3-27-92-Reserved for KGLEFM per D89-																			
223.6	43.2		VAC		Firebaugh	CA A	36.4742	120.2826	CO 276A	H	V	0				95.5	115.		S
**WINDOW CLOSE 06/16/88 **COMMENT** 66 - SITE RESTRICTED																			
224.5	44.0	NEW	APP	BPED881017MD	Firebaugh	CA A	36.4730	120.3000	CO 276A	3.0H	3.0V	100				97.3	115.		S
**COMMENT**Commercial channel operating Educational-Application returned																			
277.4	96.4	KATH	LIC	BLH840418DD	Modesto	CA A	37.3430	121.2113	1ST 277B	50.H	50.V	152				144.2	113.		
**COMMENT**GRANDFATHERED AT 50KW @ 152M HAAT																			
181.1	1.1	KRZR	LIC	BMLH870921KH	Hanford	CA A	36.3336	119.4520	3RD 279B	50.H	50.V	152				95.3	69.		

NOTE: SUBSTITUTION OF 234A FOR 276 AT FIREBAUGH ELIMINATES ALL SPACING PROBLEMS

**MULLANEY ENGINEERING, INC.**  
**GAITHERSBURG, MARYLAND**

**FIGURE 2**  
**PROPOSED CHANNEL STUDY - 276A**

**CALIFORNIA SIERRA CORPORATION**  
**SUBSTITUTION OF**  
**276A FOR 296A - OAKHURST, CA**  
**234A FOR 276A - FIREBAUGH, CA**

\*\*\*\*\* FM CHANNEL STUDY NO. 3 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-DEC-92 15:10:48 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 921207 \*\*\*\*\*

FCC REF.	234 A	POLARIZATION	ERP (KW)	HAAT	RCAMSL
Firebaugh CA US			HOR PLN BM TILT	(METER)	(METER)
36.4742 120.2826 (D.MMSS)		HORIZONTAL	6.000 0.000	100.0	
		VERTICAL	0.000 0.000	0.0	

FCC REFERENCE POINT - SUGGESTED CHANNEL SUBSTITUTION 234A FOR 276A

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AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)		HAAT (M)	D I-CON F5010 (KM)	P-CON F5050 (KM)	IR DIST (KM)	IC RSEP (KM)	REZLT IR IC
FROM	TO									HORZ	VERT						
5.8	185.9		USE		Merced	CA A	37.1620	120.2445	3RD 231A	H	V	0			53.2	31.	
***WINDOW CLOSE 01/16/91 **COMMENT**Site Restricted-Effective 12-14-90																	
103.3	283.6	KTAA	APP	BPH880613IC	Kerman	CA A	36.4259	120.0351	2ND 232A	1.35H	1.35V	150			37.6	31.	C
99.7	279.9	KTAA	LIC	BLH900424KB	Kerman	CA A	36.4429	120.0508	2ND 232A	3.00H	3.00V	100			35.2	31.	C
125.7	306.2		VAC		Hanford	CA A	36.1655	119.3539	1ST 233A	H	V				97.2	72.	
***WINDOW CLOSE 07/30/87 **COMMENT*** 26 - SITE RESTRICTED																	
128.5	309.0	NEW	APP	BPH870730MF	Hanford	CA A	36.1502	119.3743	1ST 233A	3.00H	3.00V	100			96.9	72.	
286.5	105.7	KUFY	LIC	BLH910208KA	Gilroy	CA A	37.0639	121.5037	1ST 233B	1.20H	1.20V	773			126.9	113.	
200.6	20.3	KOTRFM	LIC	BLH890206KA	Cambria	CA A	35.3126	121.0340	1ST 235B1	25.0H	25.0V	100			150.6	96.	
96.9	277.8	KBOSFM	LIC	BLH811013AH	Tulare	CA A	36.3815	118.5635	1ST 235B	16.5H	16.5V	259			137.9	113.	
358.0	177.9	KDJK	LIC	BLH850326KZ	Oakdale	CA A	37.4734	120.3108	2ND 236B	29.5H	29.5V	193			110.8	69.	
355.9	175.8	KDJK	CP	BPH891003IC	Oakdale	CA A	37.4939	120.3403	2ND 236B	16.0H	16.0V	267E			114.9	69.	

\*\*\*\*\*

**MULLANEY ENGINEERING, INC.**  
**GAITHERSBURG, MARYLAND**

**FIGURE 3**  
**PROPOSED CHANNEL STUDY - 234A**  
**(FCC REFERENCE POINT 276A)**

**CALIFORNIA SIERRA CORPORATION**  
**SUBSTITUTION OF**  
**276A FOR 296A - OAKHURST, CA**  
**234A FOR 276A - FIREBAUGH, CA**

\*\*\*\*\* FM CHANNEL STUDY NO. 4 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-DEC-92 15:11:41 \*\*\*\*\*  
 \*\*\*\*\*  
 LAST UPDATE: 921207 \*\*\*\*\*

NEW	BPED881017MD	234 A	POLARIZATION	ERP (KW)	HAAT	RCANSL
Firebaugh CA	US			HOR PLN	BM TILT	(METER)
36.4730	120.3000 (D.MSS)		HORIZONTAL	3.000	0.000	168
Central Valley Educational Services,			VERTICAL	3.000	0.000	168

PENDING APPLICATION - SUGGESTED CHANNEL SUBSTITUTION 234A FOR 276A

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AZIMUTH		CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MSS)	LONG	REL CHN	ERP (KW)		HAAT (M)	D I-CON	P-CON	IR	IC	REZLT
FROM	TO									HORZ	VERT						
8.2	188.3		USE		Merced	CA A	37.1620	120.2445	3RD 231A	H	V	0					
**WINDOW CLOSE 01/16/91 **COMMENT**Site Restricted-Effective 12-14-90																	
102.0	282.3	KTAA	APP	BPH880613IC	Kerman	CA A	36.4259	120.0351	2ND 232A	1.35H	1.35V	150					
98.5	278.7	KTAA	LIC	BLH900424KB	Kerman	CA A	36.4429	120.0508	2ND 232A	3.00H	3.00V	100					
124.7	305.3		VAC		Hanford	CA A	36.1655	119.3539	1ST 233A	H	V						
**WINDOW CLOSE 07/30/87 **COMMENT** 26 - SITE RESTRICTED																	
127.4	308.0	NEW	APP	BPH870730MF	Hanford	CA A	36.1502	119.3743	1ST 233A	3.00H	3.00V	100					
**CUT-OFF DATE = 05/27/88 **COMMENT**AMENDED 871013																	
287.0	106.1	KUFX	LIC	BLH910208KA	Gilroy	CA A	37.0639	121.5037	1ST 233B	1.20H	1.20V	773					
199.8	19.5	KOTRFM	LIC	BLH890206KA	Cambria	CA A	35.3126	121.0340	1ST 235B1	25.0H	25.0V	100					
96.6	277.5	KBOSFM	LIC	BLH811013AH	Tulare	CA A	36.3815	118.5635	1ST 235B	16.5H	16.5V	259					
359.1	179.1	KDJK	LIC	BLH850326KZ	Oakdale	CA A	37.4734	120.3108	2ND 236B	29.5H	29.5V	193					
357.1	177.0	KDJK	CP	BPH891003IC	Oakdale	CA A	37.4939	120.3403	2ND 236B	16.0H	16.0V	267E					

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**MULLANEY ENGINEERING, INC.**  
**GAITHERSBURG, MARYLAND**

**FIGURE 4**  
**PROPOSED CHANNEL STUDY - 234A**  
**(PENDING APP SITE 276A)**

**CALIFORNIA SIERRA CORPORATION**  
**SUBSTITUTION OF**  
**276A FOR 296A - OAKHURST, CA**  
**234A FOR 276A - FIREBAUGH, CA**